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Docket Management Systems  
U.S. Department of Transportation  
Room Plaza Level 401  
400 7<sup>th</sup> Street, SW  
Washington D.C. 20590-0001

October 6, 2000

Reference Docket Number: FAA-2000-8017-3

Dear Sir or Madam,

It seems to me we have the tail wagging the dog. 43.10(b)(4) third sentence requires "This marking must be in accordance with the pertinent manufacturer's marking instructions, in order to maintain the integrity of the part, as required under 45.14 of this chapter." Now the mechanic is standing there with the part in hand and has to go back to the manufacturer to REQUEST instructions per 45.14.

Manufacturers should be required to provide marking information on life-limited parts. Recommend the last sentence of 45.14 be changed to read, "Each person who produces a life-limited part must provide detailed marking instructions, or must state that the part cannot practicably be marked without compromising its integrity."

Problems with part markings are not new. 21.607(d) requires TSO parts be "Permanently and legibly..." marked. 45.15 has the same requirement for PMA parts. Some wheel manufacturers use decals glued to a wheel for this purpose, and, evidently, the FAA MIDO's accept this. When the wheel reaches a repair station it is extremely difficult to identify these wheels. Evidently someone does not understand the environment in which wheels operate. It's time to make some of these manufacturers accountable and require the regulations be followed.

Best Regards



Charles R. Hubbard  
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